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June 13, 2013

Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
2255 Cadman Plaza East
Brooklyn, NY 11201

RE: PEI Licensing, Inc. v. Di-Med International, Inc., et al.
United States District Court for the Eastern District of New York
Civil No. 11-0153 (JBW) (RML)

Dear Magistrate Judge Levy:

This firm represents Angie's Shoes and Leather Goods, Inc. ("Angie's"), defendant and third-party plaintiff in the captioned lawsuit.

According to the Scheduling Order in this case, fact discovery is due to close on June 24, 2013. Presently, there are three depositions that have been noticed but not yet taken. On May 20, 2013, third-party defendant Geoffrey Allen filed its Motion of Third-Party Defendant Geoffrey Allen Corporation for Leave To File and Amended Pleading. By this Motion, Geoffrey Allen seeks to file a five count counterclaim against Angie's and a seven count third-party complaint against a former Geoffrey Allen employee who is not a party in this case. Yesterday, June 12, 2013, Angie's filed its Response in opposition to the Motion. If the Motion is granted, the landscape of this case will change.

Presently, the Rule 30(b)(6) deposition of a representative of Geoffrey Allen is scheduled for tomorrow. Last night at 6:40 P.M., Geoffrey Allen served a "supplemental production" of 1416 documents. There is insufficient time to review and evaluate these documents by tomorrow's scheduled deposition. I do not have time available to reschedule this deposition before the June 24 deadline.

Consequently, Angie's requests that the fact discovery deadline be extended indefinitely until such time as the Court rules on Geoffrey Allen's Motion for leave to amend, and to allow the rescheduling of depositions for an appropriate time after the last minute production of documents by Geoffrey Allen. At that time, the parties will know what, if any, additional claims

Magistrate Judge Robert M. Levy

June 13, 2013

Page 2

and parties will be in this case, and what additional discovery may be necessary. The fact discovery schedule can then be addressed with Your Honor.

Both counsel for PEI Licensing, Inc. and Geoffrey Allen Corporation consent to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Norman E. Greenspan", with a large, stylized flourish at the end.

Norman E. Greenspan

cc: All Counsel of Record (Via Email)